

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

GREG ERICKSON, Individually and  
derivatively on behalf of CHESAPEAKE  
ENERGY CORPORATION,

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD  
K. DAVIDSON, V. BURNS HARGIS,  
FRANK KEATING, BREENE M. KERR,  
CHARLES T. MAXWELL, DON  
NICKELS, FREDERICK B.  
WHITTEMORE, MERRILL A. MILLER,  
JR., KATHLEEN M. EISBRENNER, and  
LOUIS A. SIMPSON,

Defendants,

and

CHESAPEAKE ENERGY  
CORPORATION, an Oklahoma  
Corporation,

Nominal Defendant.

Case No. 5:12-cv-631-M

**PLAINTIFF'S MOTION TO EXPEDITE BRIEFING REGARDING  
MOTION TO CONSOLIDATE AND APPOINT LEAD COUNSEL**

Plaintiff Greg Erickson ("Plaintiff"), pursuant to LCvR7.1(g), respectfully moves the Court for an order shortening the time for responses to Plaintiff's Motion to Consolidate and Appoint Lead Counsel, which is being filed concurrently herewith.

As described more fully in Plaintiff's Motion to Consolidate and Appoint Lead Counsel, Plaintiff seeks to consolidate the related 2012 Derivative Actions and to appoint lead counsel in the consolidated action. Plaintiff, through this motion, seeks to shorten the time for responses because the issues presented in Plaintiffs' Motion to Consolidate and Appoint Lead Counsel have already been argued exhaustively in briefing filed in connection with the previously-filed competing motions to consolidate and appoint counsel, and therefore providing a response within five days is reasonable. Conversely, allowing a full twenty-one days to respond is unnecessary and unreasonable.

Therefore, Plaintiffs respectfully request the Court require any party wishing to file a response to the Motion to Consolidate and Appoint Lead Counsel to do so on or before Thursday, July 5, 2012.

DATED: June 27, 2012

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s/ Darren Derryberry  
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*Proposed Lead Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of June, 2012, I electronically transmitted the *Plaintiff's Motion to Expedite Briefing Regarding Motion to Consolidate and Appoint Lead Counsel* to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the appropriate ECF registrants:

s/ Darren Derryberry  
DARREN DERRYBERYY